

GDPR Privacy Notice for Tenants



How we use your personal information

GDPR Privacy Notice for Tenants

This notice explains what information we collect, when we collect it and how we use this. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Who are we?

ANCHO Ltd a Scottish Charity (Scottish Charity Number SC036082), a registered society under the Co-operative and Community Benefit Societies Act 2014 (Registered Number 2559) and a Registered Social Landlord (Registration Number 306), having its Registered Office at Sovereign House, Academy Road, Irvine, KA12 8RL.

We take the issue of security and data protection very seriously and strictly adhere to guidelines published in the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679, which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are registered as a Data Controller with the Office of the Information Commissioner under registration number Z5107820 and we are the data controller of any personal data that you provide to us, unless otherwise stated in this privacy notice.

Any questions relating to this notice and our privacy practices should be sent to mail@ancho.co.uk

How we collect information from you and what information we collect

We collect information about you:

- when you apply for housing with us or through a common housing register in an area we operate, become a tenant, request services/ repairs, enter in to a factoring agreement with ourselves howsoever arising or otherwise provide us with your personal details;
- when you apply to become a member;

- from your use of our online services, whether to report any tenancy/ factor related issues, make a complaint or otherwise; and/or
- from your arrangements to make payment to us (such as bank details, payment card numbers, employment details, benefit entitlement and any other income and expenditure related information).

We may collect the following information about you and members of your household:

About You

Title

Name

Date of Birth

Gender

Address

Telephone numbers

E-mail addresses

Communication Preferences

National Insurance Number

Next of Kin

Power of Attorney

Equalities, Diversity and Inclusion

Ethnicity

Religion

Language Preference

Disability

Sexual Orientation

About Your Health and Support

Health/Medical information

Support information

Information on pregnancy

About Your Employment, Benefits and Finances

Bank details

Payment card details

Employment details

Financial details – income, benefits, debts

Details of benefits entitlements, claims and payments

Criminality, ASB and Offences

Anti-social behaviour reports/offences

Sex offences

Other

Domestic abuse/harassment

Child access details

Pet ownership

Previous address details – including landlord/mortgage provider and reason for leaving

Landlord references

Homelessness

Digital inclusion

Relationship to ANCHO Board

Members or Staff

We receive the following information from third parties:

- benefits information, including awards of Housing Benefit/ Universal Credit;
- payments made by you to us;
- complaints or other communications regarding behaviour or other alleged breaches of the terms of your contract with us, including information obtained from Police Scotland; Local Authority departments, Scottish Fire & Rescue Services and others involved in any complaint;
- reports as to the conduct or condition of your tenancy, including references from previous tenancies, and complaints of anti-social behaviour;
- housing application details from Common Housing Registers;
- reports from Local Authority partners – including Social Work and Occupational Therapists; and/or
- reports from NHS/GPs.

Why we need this information about you and how it will be used

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our tenancy agreement with you, including taking steps at your request to enter into a tenancy agreement;
- to enable us to supply you with the services and information which you have requested;
- to enable us to respond to your repair request, housing application and complaints made;
- to enable contractors to contact you in order to arrange survey and subsequent completion of Investment works such as window or kitchen renewals;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our services which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our services.

Our lawful basis for using your information

Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Special Category Data

Special categories of information means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purposes of uniquely identifying you.

Special Category data is processed on the following basis:

- Where the data subject has explicitly given consent
- For the purposes of employment, social security and social protection
- Necessary for reasons of substantial public interest
- For archiving, research and statistics

Sharing of Your Information

The information you provide to us will be treated by us as confidential. We may disclose your information to other third parties who act for us for the purposes set out in this notice, including the following:

- if we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners;
- if we instruct repair or maintenance works, your information may be disclosed to any contractor;
- if we are investigating a complaint, information may be disclosed to Police Scotland, Local Authority departments, Scottish Fire & Rescue Service and others involved in any complaint, whether investigating the complaint or otherwise;
- if we are updating tenancy details, your information may be disclosed to third parties (such as utility companies and Local Authorities, NHS, Support Services, Other Registered Social Landlords);
- if we are investigating payments made or otherwise, your information may be disclosed to payment processors, Local Authorities and the Department of Work & Pensions;
- if we are conducting a survey of our services, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results;
- if we require to pursue debt through a debt collection agency;
- if we require to engage the services of Lawyers/Solicitors in relation to tenancy or housing management matters; and/or
- unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Transfers outside the UK and Europe

We may transfer your information outside the UK and/or EEA.

Some of the applications that we use to collect information store information outside the EU/EEA such as: Survey Monkey: Online Survey Tool

Where information is transferred outside the UK or EEA we ensure that there are adequate safeguards in place to protect your information in accordance with this notice, including the following: Reciprocal EU-US 'Privacy Shield'.

Security

When you give us information we take the following steps to make sure that your personal information is kept secure and safe:

- Paper records are kept in locked offices and/or cabinets
- Access Control and Password Protection
- Managed Firewalls
- Managed Antivirus/Anti-Malware
- Patch Management
- Device Management

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant agreement we have with you.

We will generally keep your information for the following minimum periods after which this will be destroyed if it is no longer required for the reasons it was obtained:

Application and Tenancy Records	Timescale
Applications for accommodation	6 years after offer accepted
Housing benefit notifications	5 years after the date of termination of tenancy
Rent statements	Permanently
Current tenants' tenancy files, (including rent payment records and details of any complaints and harassment cases)	Permanently and for 5 years after date of termination of tenancy
Documentation, correspondence and information provided by other agencies relating to special needs of current tenants	5 years after date of termination of tenancy
Records relating to offenders, ex-offenders and persons subject to cautions	5 years after date of termination of tenancy
Right to buy purchases	20 years after purchase

Our full retention schedule is available on request.

Your Rights

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in the information or complete any incomplete information that we hold about you;
- make a request to us to delete any personal information that we hold about you;
- object to receiving any marketing communications from us or other uses of your personal information depending on the lawful basis; and
- obtain the personal information that we hold about you for your own use in specific circumstances.

If you would like to exercise any of your rights above please contact us at mail@ancho.co.uk

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

The Information Commissioner's Office – Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
Email: Scotland@ico.org.uk

The accuracy of your information is important to us please help us keep our records updated by informing us of any changes to your email address and other contact details.

Questions

We're happy to help if you're unsure about what to do or need more information.

📞 01294 313121

✉ mail@ancho.co.uk

🌐 www.ancho.co.uk

ANCHO Ltd is a Registered Society under the Co-operative and Community Benefit Societies Act 2014 (No 2559), Registered with the Scottish Housing Regulator (No 306), Recognised as a Scottish Charity (No SC036082), Registered property factor (PF000346)